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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP  
LEED ENVIRONMENTAL, INC.**

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March 6, 2000

**Telecopy and First Class Mail**

Mr. Brad Bradley  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois  
Consent Decree  
Voluntary Progress Report 10 (February 2000)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during February 2000.

**1. Actions Taken During Previous Month to Comply with the Consent Decree:**

- During February 2000, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), was temporarily demobilized from the site because of winter weather. Therefore, no activities related to remediation of residential lots, remote fill areas, or the main industrial site were performed. Through February 2000, ENTACT has completed remedial activities at 759 residential lots and 30 remote fill properties.
- During February 2000, ARCADIS Geraghty & Miller ("ARCADIS") personnel and representatives of the Group continued efforts to secure access to off-site properties associated with the implementation of the pre-design investigation for groundwater.
- On February 7, 2000, a progress meeting was held to discuss the status of the remediation of resident lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on February 7, 2000 to document the results of the meeting.



- On February 10, 2000, the Group's project coordinator issued a voluntary progress report to EPA.
- On February 10, 2000, representatives of ARCADIS and the Group's Technical Committee conducted a conference call meeting with EPA's remedial project manager to discuss the Group's difficulties in securing access to off-site properties for installation of groundwater monitoring wells. Following the conference call meeting and in response to EPA's request, ARCADIS initiated efforts to prepare a letter to document the Group's efforts to secure access.
- On February 22, 2000, the Group's project coordinator issued a letter and signed access agreement to Mr. Mark Bayley, Martin & Bailey, Inc. for installation and sampling of a groundwater monitoring well (GMMW-123) at the Martin & Bailey, Inc. facility in Madison, Illinois.
- On February 22, 2000, the Group's project coordinator issued a letter and signed access agreement to Mr. Walter Shifrin, Shifrin & Associates, Inc. for installation and sampling of a groundwater monitoring well (GMMW-117) at the Bissell Street Warehouse Company, Venice, Illinois.
- On February 22, 2000, the Group's project coordinator spoke with EPA's project manager regarding the Group's continuing efforts to secure access for installation of groundwater monitoring wells at the site.
- On February 24, 2000, the Group's project coordinator provided a letter to EPA's remedial project manager to reconfirm the Group's difficulties in efforts to secure access to off-site properties for monitoring well installation and sampling. In addition, the February 24, 2000 letter also confirmed that ARCADIS planned to mobilize to the site on February 28, 2000 to initiate field activities associated with the predesign investigation for groundwater at those properties for which access has been secured.
- On February 28, 2000, ARCADIS and its drilling contractor, Philip Environmental Services Corporation of Columbia, Illinois, mobilized to the site to initiate field activities associated with the predesign investigation for groundwater, including redevelopment of existing monitoring wells and installation of groundwater monitoring wells in areas where access has been obtained.
- On February 29, 2000, ARCADIS personnel made a presentation at the city council meeting in Venice Township regarding access for well locations and received city council approval to install monitoring wells designated as GMMW-118 and GMMW-119 within Venice Township public right-of-way.

**2. Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**

- Not applicable for this reporting period.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- ARCADIS personnel will continue to perform predesign field investigation activities for groundwater at those properties for which access has been obtained. As noted in the Group's February 24, 2000 letter, well redevelopment and well installation activities are expected to continue until about March 10, 2000 or later.
- ARCADIS personnel and representatives of the Group's Technical Committee will continue efforts to secure access to off-site properties for installation of groundwater monitoring wells and groundwater sampling activities. ARCADIS personnel will continue to prepare and finalize a letter for submission to EPA to document the Group's difficulties in securing access to off-site properties.
- ARCADIS personnel will continue efforts to revise the Predesign Investigation Work Plan for Groundwater to address EPA's comments. Finalization of the Predesign Investigation Work Plan has been delayed pending resolution of access issues associated with the proposed monitoring well installations and confirmation of final locations for the new wells.
- As soon as weather conditions allow, ENTACT will remobilize to the site and complete excavation and site restoration activities at the remaining residential and remote fill lots. At the present time, ENTACT expects to remobilize and resume remedial activities on or about March 13, 2000.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As noted above, the Group and ARCADIS have encountered difficulties in securing access to properties for installation of monitoring wells. ARCADIS personnel are currently preparing a letter to document efforts to secure access. The current status of the Group's efforts to secure access is summarized in Table 1.

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6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- As noted above, the Group's project coordinator provided a letter to EPA on February 24, 2000 to confirm ARCADIS' approximate schedule for monitoring well installation and well development activities during the February 28, 2000 - March 10, 2000 period.

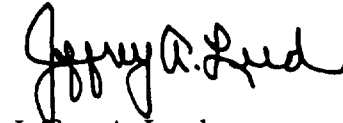
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period. Unless requested by EPA, no community relations activities are currently planned to be performed by the Group during the next six-week period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

**LEED ENVIRONMENTAL, INC.**



Jeffrey A. Leed  
Project Coordinator

attachment

cc: Mr. Bob Rogers, Illinois EPA (w/attachment, by first class mail)  
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)  
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller  
(w/attachment, by first class mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group  
(w/attachment, by first class mail)

**TABLE 1**  
**NL INDUSTRIES/TARACORP SUPERFUND SITE**  
**STATUS OF ACCESS TO PROPERTIES FOR PREDESIGN INVESTIGATION FOR GROUNDWATER**

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 101		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 102		✓	Off-site (east of main industrial)		Aetna Freight Lines Inc. 1501 Grand Granite City, IL 62040		Property owner recently identified. Access agreement to be prepared.
MW 103		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 103-91		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 104		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 104-92		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 105D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

**Table 1 (continued)**  
**Status of Access to Properties for Predesign Investigation for Groundwater**

**March 6, 2000**

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 105S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 108 D		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

**Table 1 (continued)**

**Status of Access to Properties for Predesign Investigation for Groundwater**

**March 6, 2000**

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 108 S		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 109-92		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 110		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 111-92		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 108 X	✓		Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109 X	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.

Table 1 (continued)

## Status of Access to Properties for Predesign Investigation for Groundwater

March 6, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 112	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
GMMW-113	✓		Main industrial (opposite side of State Street from State Street Warehouse)	22-2-19-24-15-401-006 22-2-19-24-15-401-007	John G. Obucina 1460 State Street Granite City, IL 62040	John G. Obucina 15th & State Streets Granite City, IL 62040	Access agreement issued on 12/17/99.
GMMW-113	✓						Access agreement issued to the City of Granite City in January 2000. Approval (right-of-way permit) has been obtained from Granite City for well installation
GMMW-114	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-115	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-116	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-117	✓		Venice Township	21-1-19-25-00-000-009	Bissell Street Warehouse Co. 1226 Bissell Avenue Venice, IL 62090	Bissell Street Warehouse Co. Highway 3/P.O. Box C Madison, IL 62060	Access agreement issued on 12/17/99. Access agreement signed by Brian Kearns, Bissell Street Warehouse Co., on 12/31/99.
GMMW-118	✓		Venice Township	21-2-19-35-15-401-906.000	Gulf Mobile Ohio RR Kerr Street Venice, IL 62090	Illinois Cental RR 455 North Cityfront Plaza Dr. Chicago, IL 60611	Access agreement issued on 12/17/99.



Table 1 (continued)

## Status of Access to Properties for Predesign Investigation for Groundwater

March 6, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-118	✓		Venice Township		Right-of-way on south side of Kerr Street (approx. 200 feet east of intersection of Kerr Street and Main Street)	City of Venice, City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, the City of Venice authorized well installation at a city council meeting.
GMMW-119	✓		Venice Township	21-2-19-35-00-000-011.T00 21-2-19-35-00-000-012.T00	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Access agreement issued on 12/17/99.
GMMW-119	✓		Venice Township		Right-of-way on the east side of 4 <sup>th</sup> Street (approx. 100 feet south of intersection of 4 <sup>th</sup> Street and Granville Street)	City of Venice City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, the City of Venice authorized well installation at a city council meeting.
GMMW-120	✓		Eagle Park Acres	21-1-19-36-08-201-004	Eagle Park Acres Imp. Assn Hill Street Madison, IL 62060	Eagle Park Acres Imp. Assn. P.O. Box 385 Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement was received from Sarah B. Page-Collins on 1/31/00. Also, a right-of-way permit authorization for monitoring well installation has been received from the Madison County Highway Department.

Table 1 (continued)

## Status of Access to Properties for Predesign Investigation for Groundwater

March 6, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-121	✓		Eagle Park Acres	21-2-19-36-16-401-036	Bobby L. & Verillian Ervin 214 Watson Street Madison, IL 62060	Bobby L. & Verillian Ervin 212 Watson Street Madison, IL 62060	Access agreement issued on 12/17/99.
					Northern parkway of Mary Street, south of Watson Street		A right-of-way permit authorization for monitoring well installation has been received from the Madison County Highway Department.
GMMW-122	✓		Eagle Park Acres	21-2-19-36-12-202-008	Willie R. Foster Earle Street Madison, IL 62060	Willie R. Foster 306 Terry Street Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement was received on 1/28/00.
					Northwest side of Earle Street, south of Allen Street		A right-of-way permit authorization for monitoring well installation has been received from the Madison County Highway Department.
GMMW-123	✓		Main industrial	21-2-19-25-07-201-014	Martin and Baily, Inc. Madison Avenue Madison, IL 26060	Martin and Bailey, Inc. P.O. Box 385 Carmi, IL 62821	Access agreement issued on 12/17/99. Access agreement signed by Mark Bayley, Martin and Baily, Inc., on 12/24/99.
					Northside of 12th Street between Madison and Iowa Streets and alley between Madison and Iowa Streets, north of 12th Street, 200 feet		Access agreement hand-delivered on 1/11/00. City of Madison City Council has approved the request for access to the public right-of-way. A written agreement/permit is not required, but the building inspector must be contacted prior to drilling.

**Table 1 (continued)****Status of Access to Properties for Predesign Investigation for Groundwater****March 6, 2000**

<b>Monitoring Well ID</b>	<b>Well Status</b>		<b>Area</b>	<b>Tax ID #</b>	<b>Site Address</b>	<b>Tax Payer Address</b>	<b>Access Status</b>
	<b>Proposed</b>	<b>Existing</b>					
GMMW-124 GMMW-125	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access agreement issued on 12/17/99.